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Loureiro Engineering Associates, Inc.

July 3, 2002

Prat & Whitney Main St
CTD990672081
R-9
RDMS # 100251

United States Environmental Protection Agency
New England
One Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

Attn.: Mr. Juan A. Perez
Ms. Kim Tisa

RE: Proposed Modification to Remedial Action Work Plan
Willow Brook and Willow Brook Pond

Dear Mr. Perez and Ms. Tisa:

In response to a telephone conversation with Ms. Tisa, the proposed addendum to the Remedial Action Work Plan for the above project submitted to the United States Environmental Protection Agency on June 27, 2002 has been amended. Specifically, additional detail has been added to define the wastewater handling procedures (sixth paragraph of the first page), and provision for judgmental sampling has been added (first paragraph on the second page).

We hope that the attached revised Decontamination Procedures for Sheet Piles and Sampling Procedures for Sheet Piles meets with your satisfaction. Should you have any further questions or comments, please do not hesitate to contact Lauren Levine of UTC at (860) 728-6520 or me.

Sincerely

LOUREIRO ENGINEERING ASSOCIATES, INC.

George F. Andrews Jr., P.E.
Project Manager

Attachment

cc: Lauren Levine, UTC
Richard Hathaway, DEP, w/o enclosure and attachments
Lori Saliby, DEP, w/o enclosure and attachments
Ernest Waterman, U.S. EPA, w/o enclosure and attachments

ADDENDUM TO

REMEDIAL ACTION WORK PLAN

United Technologies Corporation
Pratt & Whitney
Willow Brook and Willow Brook Pond
East Hartford, CT

November 2000
Revised January 2002

Addendum No. 1, June 27, 2002
Revised July 2, 2002

Decontamination Procedures for Steel Sheet Piles
&
Sampling Procedures for Steel Sheet Piles

Decontamination Procedures for Sheet Piles

Decontamination of steel sheet piles that have been in contact with contaminated soil and sediment shall be accomplished by performing a double wash double rinse procedure as follows.

First wash. Cover the entire surface with concentrated or industrial strength detergent or non-ionic surfactant solution. Contain and collect all cleaning solutions for proper disposal. Scrub rough surfaces with a scrub brush or scrubbing pad, adding cleaning solution such that the surface is always very wet, such that each 1 square foot is washed for 1 minute. Mop up or absorb the residual cleaner solution and suds with an clean, disposable, absorbent pad until the surface appears dry.

First rinse. Rinse off the wash solution with 1 gallon of clean water per square foot and capture the rinse water. Mop up the wet surface with a clean, disposable, absorbent pad until the surface appears dry.

Second wash. Cover the entire surface with environmentally preferable aqueous solvent. Contain and collect any runoff solvent for disposal. Scrub rough surfaces with a scrub brush or disposable scrubbing pad and solvent such that each 1 square foot of the surface is always very wet for 1 minute. Wipe, mop, and/or sorb the solvent onto absorbent material until no visible traces of the solvent remain.

Second rinse. Wet the surface with clean rinse solvent such that the entire surface is very wet for 1 minute. Drain and contain the solvent from the surface. Wipe the residual solvent off the drained surface using a clean, disposable absorbent pad until no liquid is visible on the surface.

Decontamination wastewaters will be collected in fractionalization tanks and sampled. Sampling data shall be compared to the Connecticut Department of Environmental Protection issued Emergency Authorization (EA) limits for this project. Treatment of the wastewater will be implemented, if necessary, for compliance with the EA. If treatment is necessary, a multi media filtration system consisting of anthracite, bentonite and activated carbon will be utilized to effectively reduce the PCB concentration in the surfactant-laden wastewater. Discharge will be directed to the Pratt & Whitney industrial sewer system after sampling.

Environmentally preferable aqueous solvent shall be selected from the US EPA Wall Chart titled: *Aqueous and Semi-Aqueous Solvent Chemicals: Environmentally Preferable Choices* (EPA-743-B-96-001, September 1996). The specific product selected and pretreatment facilities provided will meet the requirements imposed in the Emergency Authorization for Discharge issued by the State of Connecticut Department of Environmental Protection and coordinated through the Pratt & Whitney Colt Street Wastewater Treatment Facility.

Sampling Procedures for Sheet Piles

Upon completion of the decontamination procedures, the surfaces of the decontaminated sheet piles previously in contact with PCB contaminated soil/sediment will be sampled in accordance with 40 CFR 761.302 (Subpart P). The sheet piles are generally 35-feet in total length and about 3-feet wide. The lower 15-feet of each sheet was generally in contact with impacted soils. Sampling will be implemented on a one per 10 square meter basis. Based on the total number of

sheets (207) and the impacted surface area of each individual sheet (<9 square meters including both sides) we estimate the total number of sample aliquots to be 207. We will composite these aliquots into three aliquot composites for a total of about 70 sample analyses. Sample locations will be determined by dividing the entire surface into approximately 1-meter squares, then using a random number generator to select the specific locations for wipe sampling. Judgmental samples in areas of staining or discoloration will be performed as necessary to represent anomalous features. This sampling density will represent approximately 11% of the 1-meter square areas.

Sampling will be performed in accordance with 40 CFR 761.123. Specifically, a 10 cm x 10 cm template will be used to delineate the area of cleanup. The wiping medium will be a gauze pad of known size, which has been saturated with hexane. Field blanks and replicates for QA/QC will be collected in accordance with the RAWP.

Samples will be analyzed at a fixed state certified laboratory using SW-846 Method 8082 and extraction method 3550. The laboratory detection limit will be 0.4 $\mu g/100\ cm^2$. Analytical data will be derived at a maximum of one analysis per three aliquots (3 point composites). Each sheet side will be marked with paint indicating a unique reference symbol to facilitate sample representation. The analytical data will be directly compared to the action level of $1 \mu g/100\ cm^2$. Any sheets exhibiting PCB concentrations greater than 1 $\mu g/100\ cm^2$ will be decontaminated again and resampled.

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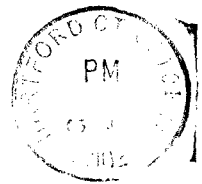

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